

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)
)
Plaintiff,)
)
v.) Case No. 2:19-CV-767-ECM
)
HYUNDAI MOTOR)
MANUFACTURING, ALABAMA,)
LLC; HYUNDAI ENG AMERICA,)
INC.; and DYNAMIC SECURITY,)
INC.)
)
Defendants.)

EXHIBIT “E” TO

**PLAINTIFF’S OBJECTIONS TO DYNAMIC SECURITY INC.’S
DEPOSITION DESIGNATIONS**

DAVITA KEY, PLAINTIFF

Case	Key, Davita
Issue Code	Dynamic Designation

KEY, DAVITA 6/20/22 VOL 1		
1	004:01 - 004:25	<p>004:01 A P P E A R A N C E S</p> <p>02</p> <p>03 APPEARING ON BEHALF OF THE PLAINTIFF:</p> <p>04 Leslie Ann Palmer, Esq.</p> <p>05 Palmer Law, LLC</p> <p>06 104 23rd Street South, Suite 100</p> <p>07 Birmingham, Alabama 35233</p> <p>08 205-285-3050</p> <p>09 leslie@palmerlegalservices.com</p> <p>10</p> <p>11 Heather Newsom Leonard, Esq.</p> <p>12 Heather Leonard P.C.</p> <p>13 2105 Devereux Circle, Suite 111</p> <p>14 Birmingham, Alabama 35243</p> <p>15 205-977-5421</p> <p>16 heather@heatherleonardpc.com</p> <p>17</p> <p>18 APPEARING ON BEHALF OF THE DEFENDANT, HYUNDAI</p> <p>19 MOTOR MANUFACTURING ALABAMA, LLC:</p> <p>20 David J. Middlebrooks, Esq.</p> <p>21 Lehr Middlebrooks Vreeland & Thompson, P.C.</p> <p>22 P.O. Box 11945</p> <p>23 Birmingham, Alabama 35202-1945</p> <p>24 205-326-3002</p> <p>25 dmiddlebrooks@lehrmiddlebrooks.com</p>
2	016:12 - 016:20	<p>016:12 Q. Now, according to your complaint, your</p> <p>13 assignment to the mail clerk position at HMMA</p> <p>14 began about July 31, 2017?</p> <p>15 A. Yes.</p> <p>16 Q. And your assignment ended on or about</p> <p>17 Tuesday, August 2nd, 2017?</p> <p>18 A. No.</p> <p>19 Q. When did it end?</p> <p>20 A. August 1st.</p>
3	017:21 - 018:24	<p>017:21 Q. So how many days did you actually go</p> <p>22 out to the HMMA plant?</p>

		<p>23 A. Two.</p> <p>24 Q. And that was on the 31st of July and</p> <p>25 the 1st of August?</p> <p>018:01 A. Yes.</p> <p>02 Q. You had never been to the plant before</p> <p>03 July 31?</p> <p>04 A. No. I came here July -- I don't know.</p> <p>05 I think it was the 19th, for my interview.</p> <p>06 Q. Okay. And you came to this building</p> <p>07 we're in right now?</p> <p>08 A. Yes.</p> <p>09 Q. Okay. For the record, we're in the</p> <p>10 Security Building. Is that your understanding,</p> <p>11 this is the Security Building?</p> <p>12 A. Yes.</p> <p>13 Q. This is where you came and interviewed?</p> <p>14 A. Yes.</p> <p>15 Q. Who did you interview with?</p> <p>16 A. Gloria Robinson.</p> <p>17 Q. Anybody else?</p> <p>18 A. Maurice Chambliss was sitting in on the</p> <p>19 interview.</p> <p>20 Q. Who did they work for, if you know?</p> <p>21 A. Gloria Robinson said that she worked</p> <p>22 for Dynamic Security.</p> <p>23 Q. How about Mr. Chambliss?</p> <p>24 A. Dynamic Security.</p>
4	019:10 - 019:24	<p>019:10 First, how did you learn of the</p> <p>11 opportunity?</p> <p>12 A. Indeed.com.</p> <p>13 Q. And Indeed is an online tool that you</p> <p>14 can apply for jobs through?</p> <p>15 A. Yes.</p> <p>16 Q. And what job did Indeed state that you</p> <p>17 were applying for?</p> <p>18 A. It said -- I'm not sure. I don't -- I</p> <p>19 mean, I'm not sure.</p> <p>20 Q. Okay. Did you know that the job was</p> <p>21 Dynamic Security?</p> <p>22 A. Yes.</p> <p>23 Q. Did you know it was a mail room job?</p> <p>24 A. Yes.</p>

5	021:08 - 021:10	021:08 Q. So you interviewed with Ms. Robinson 09 and Mr. Chambliss sometime around July 19? 10 A. Yes.
6	021:24 - 022:23	021:24 Q. And did they tell you what your pay 25 would be? 022:01 A. Yes. 02 Q. Did they tell you what your benefits 03 would be? 04 A. They gave me a paper, like the benefits 05 sheet from the -- so yes, they did. 06 Q. What benefits did Dynamic provide you? 07 A. Medical, like health insurance. 08 Q. Okay. And did they tell you where you 09 would be working physically? 10 A. Yes. 11 Q. And where would that be? 12 A. The mail room. 13 Q. Where is that located? 14 A. The address they gave me was 15 700 Hyundai Boulevard. 16 Q. Did you ever go to the mail room? 17 A. Yes. 18 Q. And relative to the Security Building 19 where we are, where would it be, the best you 20 can describe it? 21 A. I mean, probably like a ten-minute ride 22 from here. I don't really remember because that 23 was a long time ago.
7	023:04 - 023:13	023:04 A. My trainer, she took me to -- just to 05 like different buildings on the first day within 06 the first 30 minutes I was with her. 07 Q. Would those be buildings you would take 08 mail to? 09 A. Yes. 10 Q. Who trained you? 11 A. LaTonya Howell. 12 Q. Who did she work for? If you know. 13 A. I -- Dynamic Security.
8	025:09 - 025:19	025:09 Q. Now, if you would, look at the third 10 paragraph above your signature. It says "I 11 understand that compliance with the company's 12 policies and procedures is a condition of my

		<p>13 employment." Did you read that when you signed 14 this?</p> <p>15 A. Yes.</p> <p>16 Q. It also indicates in the last paragraph 17 that you are hired at will. Did you read that 18 when you signed it?</p> <p>19 A. Yes.</p>
9	027:10 - 027:21	<p>027:10 (Defendants' Exhibit 3 was marked 11 for identification.)</p> <p>12 Q. I show you what has been marked as 13 Defendants' Exhibit Number 3. And you recognize 14 this as a check and a pay stub?</p> <p>15 A. Yes.</p> <p>16 Q. And who's this check from?</p> <p>17 A. It says Dynamic Security.</p> <p>18 Q. Ms. Robinson had already told you that 19 you would be paid by Dynamic Security, didn't 20 she?</p> <p>21 A. Yes.</p>
10	029:20 - 029:25	<p>029:20 Now, you had to go to Hyundai or HMMA 21 training center for a safety class before you 22 could begin work; is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. Did you do that?</p> <p>25 A. Yes.</p>
11	037:16 - 037:17	<p>037:16 Q. And what race is Ms. Williams?</p> <p>17 A. African American.</p>
12	039:18 - 040:17	<p>039:18 Q. In the course of your two days that you 19 were out here at the HMMA plant, is there 20 anybody else you can recall speaking to at all 21 other than what's on this Defendants' Exhibit 5?</p> <p>22 A. When you say speaking to, what do you 23 mean?</p> <p>24 Q. If you spoke to anybody else that you 25 can recall.</p> <p>040:01 A. I said good morning to the person who 02 took my ID picture.</p> <p>03 Q. All right. Anything else?</p> <p>04 A. No.</p> <p>05 Q. Did you ever see any organizational 06 charts at any time during your assignment out at 07 Hyundai Motor Manufacturing, Alabama?</p>

		<p>08 A. What do you mean by organizational 09 charts?</p> <p>10 Q. Something that shows who reports to 11 whom and things of that nature?</p> <p>12 A. No.</p> <p>13 Q. Can you name anybody that you know for 14 a fact was actually employed directly by Hyundai 15 Motor Manufacturing, Alabama?</p> <p>16 A. I don't -- I don't know who was 17 employed with them.</p>
13	047:10 - 047:22	<p>047:10 Q. Do you recall getting a handbook from 11 HMMA, Hyundai Motor Manufacturing, Alabama?</p> <p>12 A. A safety handbook.</p> <p>13 Q. So the only handbook you got from 14 Hyundai Motor Manufacturing, Alabama was a 15 safety handbook?</p> <p>16 A. Yes.</p> <p>17 Q. And who gave that to you?</p> <p>18 A. I got it when I went to my safety 19 training class.</p> <p>20 Q. To your knowledge, did everyone who 21 go -- went to that class get a copy?</p> <p>22 A. Yes.</p>
14	048:24 - 053:22	<p>048:24 Q. While you were out at the Hyundai Motor 25 Manufacturing, Alabama facility, what grooming 049:01 policies did you ever see regarding your 02 employment, employment by Dynamic or your 03 assignment at the facility out here?</p> <p>04 A. Dynamic policy just was to be neatly -- 05 your appearance had to be neat.</p> <p>06 Q. And tell me the circumstances of you 07 seeing that policy.</p> <p>08 A. It was in the handbook they provided 09 me.</p> <p>10 Q. Did you ever see any other policy of 11 Dynamic about grooming?</p> <p>12 A. No.</p> <p>13 Q. Did you ever see any policies about 14 grooming from HEA ENG, America?</p> <p>15 A. Who worked for HEA?</p> <p>16 Q. Well, I can tell you one person that 17 did, but --</p>

18 A. Okay.
19 Q. -- I'm not testifying. So I don't know
20 if I --
21 MS. PALMER: Just answer the questions
22 as best you can.
23 A. Okay. Can you repeat the question?
24 MR. MIDDLEBROOKS: What was the
25 question?
050:01 (Record read as follows:
02 "Question: Did you ever see any
03 policies about grooming from HEA, ENG America?"
04 Q. (BY MR. MIDDLEBROOKS:) You answered.
05 Let me ask you. Did you ever see any
06 grooming policies that were provided to you by
07 Cassandra Williams?
08 A. Yes.
09 Q. And did you get a copy of that?
10 A. No.
11 Q. What were the circumstances of you
12 seeing that?
13 A. I asked to see it.
14 Q. And did she show it to you?
15 A. Reluctantly.
16 Q. Well --
17 A. Yeah, she showed it to me.
18 Q. Okay. And what do you recall seeing
19 when you looked at it?
20 A. It was a document on her computer in
21 Microsoft Word that said uniformed officers,
22 females.
23 Q. And what do you recall it said?
24 A. Females could not wear dreadlocks.
25 Q. And it was on her computer?
051:01 A. Yes.
02 Q. It was never printed out?
03 A. No.
04 (Defendants' Exhibit 8 was marked
05 for identification.)
06 Q. Exhibit 8. This document says
07 "Appearance Standards for Security Personnel,"
08 three pages long and Bates numbers HEA 1, 2, and
09 3.
10 Have you ever seen this document

11 before?

12 A. This is what was on the computer, the
13 first page.

14 Q. Just the first page?

15 A. That's the only page I saw.

16 Q. Well, it says, okay, under "Female
17 Officers, Hair," drop way down to the end of
18 that section, "Braids are permitted, but must be
19 well groomed and kept. Dreads or dreadlocks
20 hairstyle are prohibited." That's what you saw?

21 A. Yes.

22 Q. She didn't show you the second page?

23 A. No.

24 Q. Look at the second page. Do you see
25 where it says "Male Officers"? "Male Uniform
052:01 Officers"?

02 A. Yes.

03 Q. Drop down about halfway in that
04 section, you'll see "Braids and/or dreads not
05 permitted." Did I read that correctly?

06 A. Yes.

07 Q. So for male officers, according to this
08 policy, dreadlocks were not permitted for them
09 either?

10 A. Yes, according to this policy.

11 (Defendants' Exhibit 9 was marked
12 for identification.)

13 Q. I'll show you what we're going to mark
14 as Defendants' Exhibit Number 9. And it's
15 Bates-numbered HMMA 0003.

16 (Pause.)

17 Q. I show you what's been marked as
18 Defendants' Exhibit Number 9, Bates-numbered,
19 again, HMMA 3. And it's entitled "Hyundai Motor
20 Manufacturing, Alabama PPE & Dress Code Matrix."
21 Ms. Key, have you ever seen Defendants'
22 Exhibit 9 before?

23 A. I don't know. I don't know if I've
24 seen this. I don't...

25 I don't -- I don't know. I don't
053:01 remember it.

02 Q. You don't remember one way or the
03 other?

		<p>04 A. Yeah, I don't remember.</p> <p>05 Q. Well, it says, the application, if you</p> <p>06 look at the top, "Requirements for Entering the</p> <p>07 Work Areas," and identifies "PPE required in</p> <p>08 production areas." You didn't work in the</p> <p>09 production area, did you?</p> <p>10 A. No.</p> <p>11 Q. Okay. It doesn't say anything about</p> <p>12 folks who were in security, does it?</p> <p>13 A. No.</p> <p>14 Q. But down under "Personal Hygiene" at</p> <p>15 the bottom, it does have one entry there about</p> <p>16 hair. The only thing it says, "Hair longer than</p> <p>17 collar length -- tied back or tucked in hat."</p> <p>18 That's all it says, isn't it?</p> <p>19 A. Yes.</p> <p>20 Q. There's no mention one way or the other</p> <p>21 about dreadlocks, is there?</p> <p>22 A. Not on this paper, no.</p>
15	057:01 - 057:03	<p>057:01 Key 331. And this is the only document you were</p> <p>02 given by Hyundai?</p> <p>03 A. Yes.</p>
16	062:05 - 062:17	<p>062:05 under item 2, midway down the page, "I believe I</p> <p>06 was discriminated against by the following</p> <p>07 organizations: (Check those that apply). And</p> <p>08 you checked "Employer" and "Other." And there</p> <p>09 you write "Ms. Gloria Robinson and Ms. Cassandra</p> <p>10 Williams." Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And why did you choose to name those</p> <p>13 two people?</p> <p>14 A. Because those were the two people who I</p> <p>15 felt discriminated against me.</p> <p>16 Q. Anyone else?</p> <p>17 A. Their employers.</p>
17	063:24 - 064:14	<p>063:24 Q. It says, "No reasons were given except</p> <p>25 I was told the Koreans who own the company</p> <p>064:01 didn't want BLKS" -- Blacks? Does that stand</p> <p>02 for blacks?</p> <p>03 A. Yes.</p> <p>04 Q. -- "wearing their hair a certain way."</p> <p>05 Who told you that?</p>

		<p>06 A. Gloria Robinson.</p> <p>07 Q. Did anybody else tell you that?</p> <p>08 A. No.</p> <p>09 Q. Did she say where she knew that from?</p> <p>10 A. She said they send memos.</p> <p>11 Q. Did you see any memos?</p> <p>12 A. I can only go by what she told me.</p> <p>13 Q. You haven't seen any memos?</p> <p>14 A. No.</p>
18	067:08 - 067:10	<p>067:08 Q. But you never saw any such memos like</p> <p>09 that?</p> <p>10 A. No.</p>
19	070:16 - 070:19	<p>070:16 A. The -- this is the investigator sent me</p> <p>17 this document that was assigned to my case.</p> <p>18 Q. Why is it being filed now?</p> <p>19 A. You would have to ask the investigator.</p>
20	075:01 - 075:15	<p>075:01 Look at Interrogatory Number 11.</p> <p>02 Midway down, your answer to Number 11 says</p> <p>03 "Plaintiff states Gloria Robinson, Cassandra,</p> <p>04 Williams, Ray Cureton, LaTonya Howell, Maurice</p> <p>05 Chambliss, and Nicole Scavella were all involved</p> <p>06 in the termination decision and subject to the</p> <p>07 control and the policy of Hyundai."</p> <p>08 Was anybody else involved in that</p> <p>09 termination decision other than those you named</p> <p>10 there?</p> <p>11 A. I don't -- I don't know.</p> <p>12 Q. You don't know of anybody you could</p> <p>13 name?</p> <p>14 A. I don't know if anybody else was</p> <p>15 involved.</p>
21	076:15 - 077:25	<p>076:15 Q. Okay. What policy were they carrying</p> <p>16 out?</p> <p>17 A. Of HMMA.</p> <p>18 Q. But what policy of HMMA?</p> <p>19 A. Concerning my appearance.</p> <p>20 Q. Your hairstyle?</p> <p>21 A. Yes.</p> <p>22 Q. Is that the only policy?</p> <p>23 A. I don't know.</p> <p>24 Q. You don't know of any other policy you</p> <p>25 referred to?</p>

		<p>077:01 A. I don't know if that was the only 02 policy.</p> <p>03 Q. But you don't know of any other policy 04 you're referring to?</p> <p>05 A. I don't know if that was the only 06 policy.</p> <p>07 Q. I understand that.</p> <p>08 A. That's my answer.</p> <p>09 Q. All right.</p> <p>10 A. Because I don't know of any other 11 policy.</p> <p>12 Q. Okay. Now, I think I asked about all 13 these others, but Ray Cureton, what race is he?</p> <p>14 A. White.</p> <p>15 Q. So of those listed, he's the only white 16 person?</p> <p>17 A. Yes.</p> <p>18 Q. Look back at Defendants' Exhibit 19 Number 1, the complaint, if you would. And look 20 at paragraph 82, if you would. Are you with me 21 on that?</p> <p>22 A. Yes.</p> <p>23 Q. All right. And we've already talked 24 about these Koreans and Ms. Robinson saying they 25 were a different breed of animals and they send</p>
22	078:09 - 079:07	<p>078:09 Q. Okay. So that's who you're referring 10 to or she's referring to, to your understanding, 11 when she talks about the Koreans?</p> <p>12 A. You would have to ask her, but --</p> <p>13 Q. So this is an assumption, the 14 parenthetical?</p> <p>15 A. I was here at the Hyundai site, and I 16 don't think she would say Koreans that's in 17 South Korea or North Korea. So I would think --</p> <p>18 Q. Well, you say, "I don't think." Do you 19 know?</p> <p>20 A. Yes. That's who she was referring to.</p> <p>21 Q. HMMA and HEA?</p> <p>22 A. Yes.</p> <p>23 Q. How do you know that?</p> <p>24 A. Because she said that she even had to 25 have her supervisor talk to the Koreans here</p>

		<p>079:01 because they wouldn't talk to her directly 02 because she was a female. 03 Q. And did she say which Koreans those 04 were? 05 A. She did not identify them by name. 06 Q. Just Koreans? 07 A. Yes.</p>
23	085:11 - 086:08	<p>085:11 Q. Tell me what college you have, college 12 education you have? 13 A. I attended Auburn University, 14 Montgomery where I got my bachelor's degree, and 15 Troy University where I got my master's. 16 Q. And what's your bachelor's degree in at 17 AUM? 18 A. Humanities and social sciences. 19 Q. What year was that? 20 A. 2011. 21 Q. And I'm sure I have this somewhere in 22 my file. What's your date of birth? 23 A. 12/10/85. 24 Q. All right. And what was your master's 25 degree at Troy in? 086:01 A. Troy University. 02 Q. Yeah. What was your master's in? 03 A. Social sciences. 04 Q. And when did you get it? 05 A. 2017. 06 Q. This was before you went to work for 07 Dynamic Security; right? 08 A. Yes.</p>
24	096:17 - 096:21	<p>096:17 Q. All right. And then I think we 18 established this morning that you worked for 19 Dynamic Security for two days, July 31 and 20 August 1? 21 A. Yes.</p>
25	113:25 - 114:09	<p>113:25 Q. Okay. Let me ask you about the time 114:01 period. On July 31, how many hours were you at 02 the facility? 03 A. Less than two hours. 04 Q. And how about on August 1; how many 05 hours were you here? 06 A. Less than two hours.</p>

		<p>07 Q. So your total time working was less 08 than four hours? 09 A. Yes.</p>
26	115:01 - 115:09	<p>115:01 Q. Okay. All right. And before beginning 02 work on July 31st, you had not told Dynamic that 03 you were pregnant; right? 04 A. No. 05 Q. Okay. Is that because at the time of 06 your interview, did you know that you -- 07 A. Yes. 08 Q. -- were pregnant? 09 A. Yes.</p>
27	117:14 - 117:14	<p>117:14 Q. Now, did somebody send you home early</p>
28	118:09 - 118:19	<p>118:09 Q. Do you know why she sent you home? 10 A. She didn't tell me -- I mean, she 11 didn't say, "You're going -- you need to go home 12 because of this." 13 She said that Cassandra Williams said 14 that I was in violation with my hair. And I 15 said, "What do you want me to do?" 16 Cassandra Williams said that, "You 17 would have to wear a hat." 18 I said, "I have a hat at my house. I 19 can go get it."</p>
29	118:21 - 118:21	<p>118:21 "No. How about you just go home."</p>
30	135:02 - 135:20	<p>135:02 Q. Okay. So you interviewed on July 19th. 03 You went to the Dynamic facility on July the 04 21st? 05 A. Yes. 06 Q. Was that for orientation? 07 A. Yes. 08 Q. And how long were you at the Dynamic 09 facility? 10 A. I don't remember. 11 Q. I mean, was it all day? A couple 12 hours? 13 A. I mean, I don't remember. 14 Q. Who did you meet with at the Dynamic 15 facility on that day? 16 A. I mean, the person who was in charge of 17 the training. I don't know their name.</p>

		<p>18 Q. And that's when you were given copy of 19 the handbooks and other policies? 20 A. Yes.</p>
31	149:24 - 150:04	<p>149:24 Q. And but someone told you there was an 25 alternative to getting rid of the dreadlocks? 150:01 A. Cassandra Williams. 02 Q. And what did Ms. Williams say the 03 alternative was? 04 A. If I wore a hat all day every day.</p>
32	166:14 - 166:17	<p>166:14 Q. And what were you told? 15 A. You can go to -- he gave me the address 16 for the Dynamic Security office. He didn't say 17 what his title was or anything like that.</p>
33	167:08 - 167:13	<p>167:08 Q. All right. So Mr. Chambliss gives you 09 Ray Cureton's address; right? 10 A. Yes. 11 Q. To the Dynamic Security office in 12 Montgomery? 13 A. Yes.</p>
34	173:20 - 173:22	<p>173:20 Q. So I guess I should ask you, has anyone 21 used any racial slurs towards you? 22 A. No.</p>
35	184:04 - 184:25	<p>184:04 A. I -- I mean, I did the intake, and then 05 the investigator compiled the information 06 together and gave it to me to sign. 07 Q. When you filled out Defendants' 08 Exhibit 15, were you represented by counsel at 09 the time? 10 A. No. 11 Q. Did someone call and tell you that you 12 needed to -- why you needed to do Defendants' 13 Exhibit 15 in addition to Exhibit 14? 14 A. The investigator who was assigned to me 15 just said that I needed -- that she had some 16 documents that she needed me to sign. 17 Q. Okay. And that was one of them? 18 A. Yes. 19 Q. Do you know what the other documents 20 were that she gave you to sign? 21 A. This one right here. 22 Q. Okay. But anything besides that? You</p>

		23 said documents plural, which is what I was 24 wondering. 25 A. I apologize. Document.
36	185:19 - 185:21	185:19 Q. But do you see that they have two 20 separate charge numbers? If you'll -- 21 A. Yes, I see that, yes.
37	185:23 - 186:10	185:23 for identification.) 24 Q. All right, Ms. Key. I'm showing you 25 what's marked as Defendants' Exhibit 22. Do you 186:01 recognize that document? 02 A. No. 03 Q. Had you ever seen that document before 04 today? 05 A. No. 06 Q. Okay. I'm going to represent to you 07 that it's the notice of dismissal of your charge 08 and of your right to sue relating to the charge 09 you filed against Dynamic Security. And it's 10 your testimony that you've never seen this
38	187:14 - 188:10	187:14 Q. I mean, I assume is it either you or 15 your husband? 16 A. Yes. 17 Q. Is there anyone else who gets the mail? 18 A. No. 19 Q. Any other family members that live with 20 you other than you and your husband and your 21 three children? I guess it would have been 22 two -- well, it was two at the time? 23 A. What year? 24 Q. 2019. It would have been three. 25 A. Yeah. 188:01 Q. Other than you and your husband and 02 your three children, anyone else live with you? 03 A. No. 04 Q. Anyone else get your mail for you? 05 A. No. 06 Q. Do you have any explanation why, if 07 this was mailed to you, why you did not receive 08 it? 09 A. You'd have to talk to the postal 10 service. I don't know.

39	188:13 - 188:13	188:13 Q. Let me show you next what's marked as
40	188:17 - 189:14	<p>188:17 Q. Okay. Tell us for the record what that document is.</p> <p>189:01 A. A determination letter.</p> <p>189:02 Q. Okay. And what address was that sent to?</p> <p>189:03 A. My address.</p> <p>189:04 Q. And for the record, can you tell us what that is?</p> <p>189:05 A. 6940 Wrangler Road, Apartment C.</p> <p>189:06 Q. Is that the same one as what we looked at earlier?</p> <p>189:07 A. Yes.</p> <p>189:08 Q. And did you receive this determination in the mail?</p> <p>189:09 A. Yes.</p> <p>189:10 Q. At what point in time, and just tell me the year. Don't want to know what you talked about. But at what point in time did you retain counsel?</p> <p>189:11 A. 2020.</p> <p>189:12 Q. And this says that it was mailed out on or around June 10th of 2019. Do you know if you would have received it around that same time?</p>
41	189:20 - 190:06	<p>189:20 I'm going to show you what's marked as Defendants' Exhibit 24, ask if you recognize that document?</p> <p>189:21 A. Yes.</p> <p>189:22 Q. That's the letter from the EEOC telling you that conciliation efforts on your charge had failed? Is that an accurate description?</p> <p>189:23 A. It just says that they won't bring a lawsuit against the respondent.</p> <p>189:24 Q. Okay. But do you remember receiving that letter in the mail?</p> <p>189:25 A. Yes.</p>
42	190:11 - 191:11	<p>190:11 Q. But that did come in the mail; right?</p> <p>190:12 A. Yes.</p> <p>190:13 (Defendants' Exhibit 25 was marked for identification.)</p> <p>190:15 Q. Let me show you what's marked as Defendants' Exhibit 25. Do you recognize that</p>

		<p>17 document?</p> <p>18 A. Yes.</p> <p>19 Q. Tell us what that is.</p> <p>20 A. A Notice of Right to Sue.</p> <p>21 Q. And you received that in the mail from</p> <p>22 the EEOC?</p> <p>23 A. Yes.</p> <p>24 Q. And do you know if there was any delay</p> <p>25 in receiving that?</p> <p>191:01 A. I don't know.</p> <p>02 Q. And it's sent to the same Wrangler Road</p> <p>03 address as the other documents we have been</p> <p>04 looking at?</p> <p>05 A. Yes.</p> <p>06 Q. Well, what did you understand these</p> <p>07 last three documents that we were looking at,</p> <p>08 what impact, if any, did you think they had on</p> <p>09 the original charge you had filed against</p> <p>10 Dynamic Security?</p> <p>11 A. That they were all the same thing.</p>
43	191:19 - 192:06	<p>191:19 Q. But you knew that you had filed two</p> <p>20 separate charges; right?</p> <p>21 A. When I filed my charge, I didn't -- I</p> <p>22 filed -- no, I didn't know there were two</p> <p>23 separate charges. I figured they were all the</p> <p>24 same thing.</p> <p>25 Q. But when we looked at 14 -- at</p> <p>192:01 Exhibits 14 and 15 earlier, there were two</p> <p>02 separate charges filed; right? One that lists</p> <p>03 Dynamic as the employer and one that lists HMMA</p> <p>04 as the employer; right? We can get them back</p> <p>05 out again if you want us to.</p> <p>06 A. Yeah, but I didn't know that they were</p>
44	193:05 - 193:13	<p>193:05 Q. (BY MR. REDMOND:) Is there anything</p> <p>06 anyone from the EEOC said that led you to</p> <p>07 believe that the two were combined into one</p> <p>08 charge?</p> <p>09 A. I don't think it's any -- I don't know.</p> <p>10 I know that when I went there to do the charge</p> <p>11 and with -- that they just -- I just figured</p> <p>12 that it was all just the same thing. I didn't</p> <p>13 know that it was separate.</p>

45	227:21 - 227:25	<p>227:21 jury trial waiver. And I couldn't hear it very well. Do you remember what it was that you --</p> <p>23 A. I just -- it just -- I just said that</p> <p>24 "It is the desire of Dynamic Security to resolve</p> <p>25 disputes whenever possible in a fair and</p>
46	243:07 - 243:09	<p>243:07 Q. When did you first start wearing your hair in dreadlock style?</p> <p>08 A. When I was 18.</p>
47	251:11 - 252:13	<p>251:11 Q. And what phone did you use to take these photos?</p> <p>12 A. The phone that I had at that time.</p> <p>14 Q. Is that the one that's now cracked?</p> <p>15 A. Yes.</p> <p>16 Q. And has the journal on it?</p> <p>17 A. Yes.</p> <p>18 Q. Did you print these out? How did we get these images?</p> <p>19 A. I -- I think I emailed them with my EEOC case or something like that.</p> <p>22 Q. To who? To the EEOC?</p> <p>23 A. Yes. I don't remember exactly. I</p> <p>24 didn't print them out. I know they were sent</p> <p>25 via email. Or maybe -- I think I did print them</p> <p>252:01 out. I think I had to print them out for either</p> <p>02 the EEOC or for my unemployment hearing. I just</p> <p>03 don't remember which one exactly.</p> <p>04 Q. So you printed out or emailed these images of your hair; correct?</p> <p>06 A. Yes.</p> <p>07 Q. But you didn't print out or email the journal entries; correct?</p> <p>09 A. Yes.</p> <p>10 Q. And didn't print out or email the image of the photo of your hair that you said you were told would be acceptable; correct?</p> <p>13 A. Yes.</p>
48	254:04 - 254:11	<p>254:04 Q. Are you aware of any laws that apply in Alabama that prohibit an employer from having a policy against dreadlocks?</p> <p>05 A. No.</p> <p>08 Q. Have you ever been aware of any laws</p> <p>09 that apply in Alabama that prohibit an employer</p>

		10 from having a policy that prohibits dreadlocks? 11 A. No.
49	260:21 - 260:21	260:21 Q. And you continued to wear your hair in
50	261:05 - 261:05	261:05 was covered, as she instructed me to.
51	261:10 - 262:20	<p>261:10 Q. And you said after your interview with 11 Ms. Robinson and Mr. Chambliss, Ms. Robinson 12 called in Cassandra Williams and asked her about 13 your hairstyle?</p> <p>14 A. Yes.</p> <p>15 Q. And I believe you said that 16 Ms. Williams turned up her nose at your 17 hairstyle?</p> <p>18 A. Yes.</p> <p>19 Q. What do you mean by that?</p> <p>20 A. She turned her nose up.</p> <p>21 Q. What is that? Like did she say 22 anything?</p> <p>23 A. Like if you see something you don't 24 like --</p> <p>25 Q. Uh-huh.</p> <p>262:01 A. You turn -- that's what she did.</p> <p>02 Q. And she asked if you could take it 03 down?</p> <p>04 A. Yes.</p> <p>05 Q. And she asked if you could get it cut?</p> <p>06 A. Nope. She asked me could I take it 07 down, and I told her I would have to cut all of 08 my hair off.</p> <p>09 Q. Okay. So on that date, July 19th, she 10 turned up her nose, asked if you could change 11 your hairstyle, put it up; correct?</p> <p>12 A. She asked if I could take it down.</p> <p>13 Q. Take it down. And in one of your 14 earlier statements, you said, and as you 15 testified today, I believe, in response to that, 16 you showed her on your phone an alternate 17 hairstyle?</p> <p>18 A. Yes.</p> <p>19 Q. With your hair up in a bun?</p> <p>20 A. Yes.</p>
52	265:23 - 266:05	265:23 Q. So Ms. Williams and Ms. Robinson, you 24 showed them the picture on Facebook of a

		<p>25 hairstyle that was up, an up-do style, and they 266:01 told you that was acceptable; that that would be 02 okay?</p> <p>03 A. Yes.</p> <p>04 Q. And that was on July 19th?</p> <p>05 A. Yes.</p>
53	266:10 - 266:20	<p>266:10 Q. And that was either on July 21st or 11 27th? Is that what we've decided today?</p> <p>12 A. Yes.</p> <p>13 Q. When you went to the Dynamic Security 14 site for training, had you put your hair into 15 that up-do style?</p> <p>16 A. No.</p> <p>17 Q. When you came back to this facility on 18 July 31st, had you put your hair in that up-do 19 style?</p> <p>20 A. No.</p>
54	268:08 - 268:19	<p>268:08 So when you came back the first time to 09 start work on July 31st, Ms. Williams asked you 10 why you had not changed your hairstyle as she'd 11 instructed you; correct?</p> <p>12 A. Yes.</p> <p>13 Q. And what was your response to her?</p> <p>14 A. I told her that when I went to my 15 training, I asked Nicole if my hair was okay, 16 and she said there was nothing wrong with it. 17 And I said also that the Dynamic handbook 18 doesn't have -- doesn't say anything against me 19 wearing my hair like this.</p>
55	269:18 - 270:03	<p>269:18 Q. And Ms. Williams showed you the 19 grooming policy that we looked at, which I 20 believe is Exhibit Number 8, on her computer; 21 correct?</p> <p>22 A. Yes. Reluctantly.</p> <p>23 Q. And that policy said that dreadlocks 24 were not permitted?</p> <p>25 A. For female officers; correct.</p> <p>270:01 Q. Were they permitted for males?</p> <p>02 A. I didn't see the male policy until 03 today. And according to what I saw today, no.</p>
56	270:21 - 271:03	<p>270:21 Q. You can answer. Did you ever see any 22 males wearing dreadlocks at the facility?</p>

		<p>23 A. No.</p> <p>24 Q. Did you ever see any white people</p> <p>25 wearing dreadlocks at the facility?</p> <p>271:01 A. I did not see any males or any white</p> <p>02 people. That does not mean that they did not</p> <p>03 have them.</p>
57	277:21 - 277:25	<p>277:21 Q. When did you first learn you were</p> <p>22 pregnant?</p> <p>23 A. In May of 2017.</p> <p>24 Q. May of 2017?</p> <p>25 A. Yes.</p>
58	278:07 - 278:18	<p>278:07 Q. Cassandra Williams, she is an African</p> <p>08 American female?</p> <p>09 A. Yes.</p> <p>10 Q. Did she ever say anything negative to</p> <p>11 you about your race?</p> <p>12 A. She just looked -- turned up her nose</p> <p>13 in disgust about my hair.</p> <p>14 Q. Did she ever say anything negative</p> <p>15 about your race?</p> <p>16 A. That's about my race, my hair.</p> <p>17 Q. Anything else?</p> <p>18 A. No.</p>